Composite Exhibit A

Johnson & Johnson

October 13, 2004

RE: Attached Document Preservation Notice
For Marie Hartley and Earle Harris v. Ethicon, Inc.
Product Liability Matter involving Mersilene Tape

TO: Rita McIntyre, Risk Manager

As described in the attached hold notice, Ethicon, Inc. is a party to a lawsuit arising out of the alleged use of Mersilene Tape.

It is imperative that the specified documents be preserved pending further written notice from the Law Department. Please disseminate the full text of the attached notice company-wide by e-mail and, in addition, distribute the notice in hard copy to all of those you believe have or might have the documents at issue.

Please review the attached list of operating companies and notify us if you are aware of any companies, other than those that have been check marked, that should receive a copy of the subject preservation notice.

Please assure that departing employees are directed to provide any paper or electronic records to your department covered by this and all active hold notices no later than the pre-exit interview. In addition, please confirm through the IT group that those employees that you believe have or might have documents have created the personal folder described hereafter.

Please return to me within five (5) days a copy of the distribution instructions provided for the e-mail and/or hard copy distribution of the document hold memo.

Thank you for your assistance.

Karen L. McAndrews

Attachment

cc Mike Chester
Taysen Van Itallie (w/enclosures)
Larry Russo
Anne Kottaras
Lori Green (QCS Dept.)
Giuliano Chicco
Marianne De Jianne
Barbara Klak

Consumer

- ☐ Johnson &Johnson Consumer Companies, Inc.
- ☐ Johnson & Johnson Inc. (Canada)
- ☐ Johnson & Johnson Sales and Logistics Company Division of Johnson & Johnson Consumer Companies, Inc.
- ☐ Johnson & Johnson Vision Care, Inc.
- ☐ McNeil Consumer & Specialty Pharmaceuticals Division of McNEIL-PPC, Inc.
- ☐ McNeil Consumer Healthcare Division of McNeil PDI Inc. (Canada)
- ☐ McNeil Nutritionals Division of McNEIL-PPC, Inc.
- ☐ Neutrogena Corporation
- ☐ Personal Products Company Division of McNEIL-PPC, Inc.
- ☐ The Spectacle Lens Group Division of Johnson & Johnson Vision Care, Inc.
- ☐ Johnson & Johnson Consumer & Personal Products Worldwide, Division of Johnson & Johnson Consumer Companies, Inc.
- ☐ Executive Committee
- ☐ Group Operating Committee

Medical Devices & Diagnostics

- ☐ Advanced Sterilization Products Division of Ethicon, Inc.
- ☐ Biosense Webster, Inc.
- ☐ Cardiovations Division of Ethicon, Inc.
- ☐ Codman & Shurtleff, Inc.
- ☐ Cordis Cardiology Division of Cordis Corporation
- ☐ Cordis Corporation
- ☐ Cordis de Mexico, S.A. de C.V.
- ☐ Cordis Endovascular Division of Cordis Corporation
- ☐ Cordis Neurovascular, Inc.
- ☐ DePuy, Inc.
- ☐ DePuy International Limited
- ☐ DePuy Mitek, Inc.
- ☐ DePuy Orthopaedics, Inc.
- ☐ DePuy Spine, Inc.
- ☐ Diabetes Diagnostics, Inc.
- ☒ Ethicon, Inc.
- ☐ Ethicon Endo-Surgery, Inc.
- ☐ Gynecare Worldwide Division of Ethicon, Inc.
- ☐ Independence Technology, L.L.C.
- ☐ Johnson & Johnson Gateway, LLC
- ☒ Johnson & Johnson Health Care Systems Inc.
- ☐ Johnson & Johnson Wound Management Division of Ethicon, Inc.
- ☐ Lifescan, Inc.
- ☐ Nitinol Development Corporation
- ☐ Ortho-Clinical Diagnostics (U.K.)
- ☐ Ortho-Clinical Diagnostics, Inc.
- ☐ Therakos, Inc.
- ☐ Executive Committee
- ☐ Group Operating Committee

Pharmaceutical

- ☐ ALZA Corporation
- ☐ Alza Ireland Limited
- ☐ Centocor, Inc.
- ☐ Centocor B.V.
- ☐ Cilag AG
- ☐ Cilag AG International
- ☐ J-C Healthcare Ltd. (Israel)
- ☐ Johnson & Johnson • Merck Consumer Pharmaceuticals Co.
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C.
- ☐ Johnson & Johnson Pharmaceutical Research & Development, a division of Janssen Pharmaceutica N.V.
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (France)
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (Spain)
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L,L.C. (Switzerland)
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (U.K.)
- ☐ Janssen Korea Ltd.
- ☐ Janssen Pharmaceutica N.V. (Belgium)
- ☐ Janssen Pharmaceutica Inc.
- ☐ Janssen-Cilag AB (Sweden)
- ☐ Janssen-Cilag AG (Switzerland)
- ☐ Janssen-Cilag A/S (Denmark)
- ☐ Janssen-Cilag A/S (Norway)
- ☐ Janssen-Cilag Asia-Pacific (Hong Kong)
- ☐ Janssen-Cilag B.V. (Netherlands)
- ☐ Janssen-Cilag Egypt Ltd.
- ☐ Janssen-Cilag Farmaceutica, Lda. (Portugal)
- ☐ Janssen-Cilag GmbH (Germany)
- ☐ Janssen-Cilag Investments, Ltd. (Ireland)
- ☐ Janssen-Cilag Ltd. (U.K.)
- ☐ Janssen-Cilag N.V. (Belgium)
- ☐ Janssen-Cilag OY (Finland)
- ☐ Janssen-Cilag Pharma GmbH (Austria)
- ☐ Janssen-Cilag Pharmaceuticals (India)
- ☐ Janssen-Cilag Pharmaceutical S.A.C.I. (Greece)
- ☐ Janssen-Cilag Polska, Sp. z o.o. (Poland)
- ☐ Janssen-Cilag Pty. Ltd. (Australia)
- ☐ Janssen-Cilag Pty. Ltd. (New Zealand)
- ☐ Janssen-Cilag, S.A. (Spain)
- ☐ Janssen-Cilag S.A.S. (France)
- ☐ Janssen-Cilag S.p.A. (Italy)
- ☐ Janssen-Cilag s.r.o. (Czech Republic)
- ☐ Janssen-Cilag Singapore/Malaysia
- ☐ Janssen-Cilag Taiwan
- ☐ Janssen Ortho LLC
- ☐ Janssen-Ortho Inc. (Canada)
- ☐ Janssen Pharmaceutica (Indonesia)
- ☐ Janssen Pharmaceutica (Philippines)
- ☐ Janssen Pharmaceutica Limited (Thailand)
- ☐ Janssen Pharmaceutica (Pty.) Limited (South Africa)
- ☐ J O M Pharmaceutical Services Division of Ortho-McNeil Pharmaceutical, Inc.
- ☐ Noramco, Inc.
- ☐ OMJ Pharmaceuticals, Inc.
- ☐ OraPharma, Inc.
- ☐ Ortho Biologics LLC
- ☐ Ortho Biotech Inc.
- ☐ Ortho Biotech Products, L.P.
- ☐ OrthoNeutrogena division of Ortho-McNeil Pharmaceutical, Inc.
- ☐ Ortho Pharmaceutical, Inc.
- ☐ Ortho-McNeil Pharmaceutical, Inc.
- ☐ (PGSM) Pharmaceutical Group Strategic Marketing
- ☐ PSGA Division of Ortho-McNeil Pharmaceutical, Inc.

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Pharmaceutical (Continued)

- ☐ Scios Inc.
- ☐ Tasmanian Alkaloids Pty. Ltd.
- ☐ Tibotech, Inc.
- ☐ Tibotec Therapeutics Division of Ortho Biotech Products, L.P.
- ☐ Tibotec-Virco Comm. VA (Belgium)
- ☐ Xian-Janssen Pharmaceutical Ltd. (China)
- ☐ Executive Committee
- ☐ Group Operating Committee

J&J Corporate (Tier 1)

- ☐ Corporate Secretary
- ☐ EEOC
- ☐ General Law
- ☐ Government Affairs
- ☐ Government Relations (Washington)
- ☐ HQ Human Resources
- ☐ Internal Audit
- ☐ Investor Relations
- ☐ Johnson &Johnson Development Corporation
- ☐ Patent Law
- ☐ Public Relations
- ☐ Quality Compliance Services
- ☐ Sterilization Science
- ☐ Technical Resources
- ☐ J&J Process Excellence
- ☐ Trademark Law
- ☐ Worldwide Advertising
- ☐ Worldwide Compensation Resources

J&J Corporate (Tier 2)

- ☐ Administration Financial Services
- ☐ (CIM) Corporate Information Management
- ☐ Accounts Payable
- ☐ Auto Fleet
- ☐ Benefits
- ☐ CGC – Latin America
- ☐ Corporate Benefits
- ☐ Corporate College Relations
- ☐ Corporate Contributions
- ☐ Corporate Controller- Consolidations
- ☐ Corporate Controller- Financial Analysis
- ☐ Corporate Controller- HQ Accounting
- ☐ Corporate Office of Science and Technology (COSAT)
- ☐ Corporate Savings
- ☐ Corporate Travel
- ☐ Education & Development
- ☐ eJNJ, LLC
- ☐ Facilities Planning & Construction
- ☐ Finance
- ☐ Finance Information Management
- ☐ Global Finance & Banking
- ☐ Health & Wellness
- ☐ Health Care Compliance
- ☐ HQ Administrative Services
- ☐ HQ Facilities
- ☐ HQ Records Management
- ☐ HQ Security
- ☐ Int'l Recruitment & Personnel Development
- ☐ International Finance and Contingency Group
- ☐ International Finance/VP-Corp. Finance
- ☐ J&J Business Services, Puerto Rico
- ☐ J&J Business Services, U.S.
- ☐ J&J Finance Corporation
- ☐ Labor Relations
- ☐ Learning Services
- ☐ Management Training
- ☐ Medical
- ☐ Network & Computing Services, a Division of Johnson & Johnson Services, Inc. (NCS)
  (Records Mngr. – Nancy Ur)
- ☐ Office of Diversity
- ☐ Organizational Planning & Development
- ☐ Payroll
- ☐ Pension Funds
- ☐ Placement
- ☐ Purchasing
- ☐ Real Estate Administration
- ☐ Recruiting
- ☐ Relocation Services
- ☐ Reprographics
- ☐ Risk Management
- ☐ Sales Recruiting
- ☐ Strategic Consumer Alliances Group
- ☐ Strategic Sourcing
- ☐ Tax
- ☐ VP, Headquarters Services
- ☐ Worldwide Corporate Security
- ☐ Worldwide Engineering

J&J LAW DEPARTMENT
DOCUMENT PRESERVATION NOTICE
DO NOT DESTROY
SPECIFIED DOCUMENTS

October 13, 2004

RE: Hold Notice for Marie Hartley and Earle Harris v. Ethicon, Inc.

Ethicon, Inc. is party to a lawsuit involving Mersilene Tape.

In connection with this matter, it is vital to preserve all documents relating in any way to the below listed subject matters until contrary written notice is received from the J&J Law Department. **Failure to preserve these materials could result in Court imposed penalties or sanctions on both the company and/or individual employees.**

Do not discard, destroy or alter in any way any of the documents (electronic or paper) described below. Please ensure that these instructions are followed.

Please save and preserve all documents in categories described below, including e-mails and attachments, drafts, letters, memos, notes (handwritten or typed), reports and tables (either printed or on the computer), slides or other graphics, data stored on computer, audio or video tapes, "working" or other personal files, notes, guidelines and procedures and minutes. Documents must be maintained even if known to be duplicates of documents held by other persons or you, and even if the duplicate has notes or handwritten comments on it.

"Document" includes all written materials, including all drafts as well as finalized documents, all e-mails and other electronic media (computer files), and all other types of recorded information such as audiotapes, video tapes, etc.

Instructions for Handling Electronic Materials

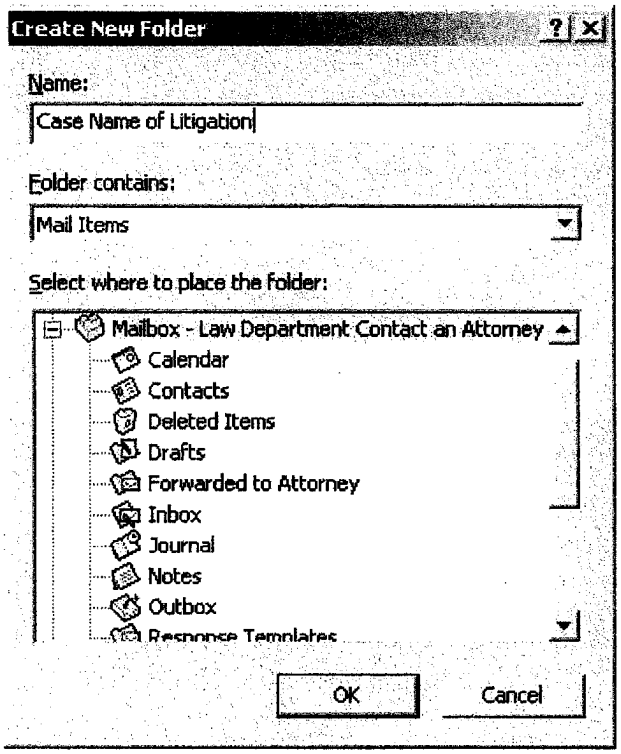
In the event you have e-mails and attachments that fall within the identified categories, you must create a new e-mail folder per product to which you should copy all such sent or received e-mails and attachments so as to prevent their inadvertent deletion. The new folder must be titled "[Product] Litigation." Instructions on how to create this folder for Microsoft Outlook 2000 and Microsoft Exchange users are attached. This request means all e-mails and attachments that fit the identified description (whether currently in other folders or not now in folders) should be copied into the [Product] Litigation folder. Specifically this includes copying e-mails from the "in-box," "sent items," "drafts," and "deleted items" location in Outlook or Exchange, and documents maintained on hard drives as well as on the LAN. For all new emails, you should copy the e-mails and attachments to the new e-mail folder within three working days of the e-mails being opened or created by you. For existing emails, you should copy individual emails or entire folders of emails, if relevant, into the new folder.

Creating a Personal Folder for Microsoft Outlook/Exchange

1. Click the word **"Mailbox – [your user name]"** to switch to your "Mailbox – [your user name]" (If you're not already there.)

2. Chose **File->Folder->New Folder** (or press Ctrl+Shift+E) to open the Create New Folder dialog box.

3. Confirm that the word **"Mailbox – [your user name]"** is highlighted in the list of folders at the bottom of the Create New Folder dialog box.



4. In the **Name** text box enter ["Product" Litigation] as the name for your new folder.

5. Click OK to close the Create New Folder dialog box.

6. Visually confirm that the ["Product" Litigation] folder appears.

7. Copy e-mails and attachments into the ["Mersilene Tape" Litigation] folder per hold instructions.

8. Please hold these materials until further notice.

If you have any questions about what documents should be preserved as a result of this notice, please contact me at (732) 524-2472. If you cannot locate me, please contact Taysen Van Itallie at (732) 524-2075.

Lisbeth A. Warren

Subject matters of documents to be preserved:
Hold all documents, memoranda, notes, files, e-mails, etc. relating to: Mersilene Tape

1. **Labeling:** All documents pertaining to Mersilene Tape labeling or labeling revisions, including draft and final professional package inserts, patient information, minutes and notes of labeling meetings and all communications regarding same.

2. **Pharmacovigilence**: Adverse Event Reports, line listings or other data, analysis, compilations or discussions of adverse events.

3. **Regulatory**: All final draft communications with regulatory authorities regarding the Mersilene Tape including FDA correspondence and inspection records, 483's, IND, NDA, BLA, PMA and 510K, and other regulatory files and audit files including product monographs files (as applicable).

4. **Discovery, Research and Development**: All proposed, completed or ongoing studies, investigations, assessments or clinical evaluations, design, development and testing, fact books, product history, budget analysis, presentations and related communications pertaining to the Mersilene Tape.

5. **Product Communications**: All documents pertaining to dear doctor letters, communications with health care professionals or patients including written responses to product inquiries and attachments, telephone logs or other records or communication files dealing with this incident, plaintiff or event including documents pertaining to: records of plaintiff's complaint and incident, if known, and the product actually involved, if returned or available. Also included should be bibliographies, abstracts, reprints, literature search requests, search results, product complaints, investigations, correspondence and testing of the product at issue.

6. **Marketing and Sales Material**: All documents developed for marketing of Mersilene Tape, including all print and broadcast marketing materials, contracts and communications with advertising agencies, training and detailing materials, all present and past labeling including package inserts and patient guides held by sales representatives but not for distribution, brochures, graphics, other trade pieces, call logs, notes, diaries or other records pertaining to communications with health care professionals, budgeting, and sales data, including that provided by third party communications regarding same.

7. **Manufacturing Documents**: If product lot batch is known, all Mersilene Tape lot and batch records, quality assurance and manufacturing controls and product complaints.

8. **Distribution:** Retail contracts pertaining to the distribution and wholesale of the product at issue including correspondence, sales information, invoices, bills of lading, distribution tracking or analysis and sales history.

Johnson & Johnson

UPDATED

July 26, 2005

RE: Attached Document Preservation Notice
For Marie Hartley and Earle Harris v. Ethicon, Inc.
Product Liability Matter involving Mersilene Mesh

TO: Linda McNelis, Risk Management Product Manager

As described in the attached hold notice, Ethicon, Inc. is a party to a lawsuit arising out of the alleged use of *Mersilene Mesh, Product Code RMI, Lot #LDP085.*

It is imperative that the specified documents be preserved pending further written notice from the Law Department. Please disseminate the full text of the attached notice company-wide by e-mail and, in addition, distribute the notice in hard copy to all of those you believe have or might have the documents at issue.

Please review the attached list of operating companies and notify us if you are aware of any companies, other than those that have been check marked, that should receive a copy of the subject preservation notice.

Please assure that departing employees are directed to provide any paper or electronic records to your department covered by this and all active hold notices no later than the pre-exit interview. In addition, please confirm through the IT group that those employees that you believe have or might have documents have created the personal folder described hereafter.

For a comprehensive list of hold notices that pertain to your company [U.S. only] or J&J headquarters department, please visit the following website: http://ncsusrajjcnet1p/documenthold/webpages/queryselect.aspx and select the appropriate operating company or corporate department.

Please return to me within five (5) days a copy of the distribution instructions provided for the e-mail and/or hard copy distribution of the document hold memo.

Thank you for your assistance.

Karen L. McAndrews

Attachment
cc Joe Braunreuther
Taysen Van Itallie
Larry Russo
Steven Zellin
Danielle Devito (QCS Dept.)

Marianne De Jianne
Fernand Nedee *(for distribution ex USA only)*
Filip Verhoeven *(for distribution ex USA only)*

Consumer

- ☐ Johnson &Johnson Consumer Companies, Inc.
- ☐ Johnson & Johnson Inc. (Canada)
- ☐ Johnson & Johnson Kft. (Hungary)
- ☐ Johnson & Johnson Sales and Logistics Company Division of Johnson & Johnson Consumer Companies, Inc.
- ☐ Johnson & Johnson Vision Care, Inc.
- ☐ McNeil Consumer & Specialty Pharmaceuticals Division of McNEIL-PPC, Inc.
- ☐ McNeil Consumer Healthcare Division of McNeil PDI Inc. (Canada)
- ☐ McNeil Nutritionals, LLC
- ☐ Neutrogena Corporation
- ☐ Personal Products Company Division of McNEIL-PPC, Inc.
- ☐ The Spectacle Lens Group Division of Johnson & Johnson Vision Care, Inc.
- ☐ Johnson & Johnson Consumer & Personal Products Worldwide, Division of Johnson & Johnson Consumer Companies, Inc.

Medical Devices & Diagnostics

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- ☐ Biosense Webster, Inc.
- ☐ Cardiovations Division of Ethicon, Inc.
- ☐ Codman & Shurtleff, Inc.
- ☐ Cordis Cardiology Division of Cordis Corporation
- ☐ Cordis Corporation
- ☐ Cordis de Mexico, S.A. de C.V.
- ☐ Cordis Endovascular Division of Cordis Corporation
- ☐ Cordis Europa N.V.
- ☐ Cordis Holding Belgium B.V.B.A.
- ☐ Cordis Holding Italy S.r.l.
- ☐ Cordis LLC
- ☐ Cordis Medizinische Apparate GmbH
- ☐ Cordis Neurovascular, Inc.
- ☐ Cordis S.A.S.
- ☐ DePuy, Inc.
- ☐ DePuy International Limited
- ☐ DePuy Mitek, Inc.
- ☐ DePuy Orthopaedics, Inc.
- ☐ DePuy Spine, Inc.
- ☐ Diabetes Diagnostics, Inc.
- ☒ Ethicon, Inc.
- ☐ Ethicon Endo-Surgery, Inc.
- ☐ Gynecare Worldwide Division of Ethicon, Inc.
- ☐ Independence Technology, L.L.C.
- ☐ Johnson & Johnson Gateway, LLC
- ☐ Johnson & Johnson Health Care Systems Inc.
- ☐ Johnson & Johnson Wound Management Division of Ethicon, Inc.
- ☐ Lifescan, Inc.
- ☐ Nitinol Development Corporation
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Pharmaceutical

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- ☐ Cilag AG
- ☐ Cilag AG International
- ☐ J-C Healthcare Ltd. (Israel)
- ☐ Johnson & Johnson • Merck Consumer Pharmaceuticals Co.
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C.
- ☐ Johnson & Johnson Pharmaceutical Research & Development, a division of Janssen Pharmaceutica N.V.
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (France)
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (Spain)
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (Switzerland)
- ☐ Johnson & Johnson Pharmaceutical Research & Development, L.L.C. (U.K.)
- ☐ Janssen Korea Ltd.
- ☐ Janssen Pharmaceutica N.V. (Belgium)
- ☐ Janssen Pharmaceutica Inc.
- ☐ Janssen Pharmaceutica Products, L.P.
- ☐ Janssen-Cilag AB (Sweden)
- ☐ Janssen-Cilag AG (Switzerland)
- ☐ Janssen-Cilag A/S (Denmark)
- ☐ Janssen-Cilag A/S (Norway)
- ☐ Janssen-Cilag Asia-Pacific (Hong Kong)
- ☐ Janssen-Cilag B.V. (Netherlands)
- ☐ Janssen-Cilag Egypt Ltd.
- ☐ Janssen-Cilag Farmaceutica, Lda. (Portugal)
- ☐ Janssen-Cilag GmbH (Germany)
- ☐ Janssen-Cilag Investments, Ltd. (Ireland)
- ☐ Janssen-Cilag Kft. (Hungary)
- ☐ Janssen-Cilag Ltd. (U.K.)
- ☐ Janssen-Cilag N.V. (Belgium)
- ☐ Janssen-Cilag OY (Finland)
- ☐ Janssen-Cilag Pharma GmbH (Austria)
- ☐ Janssen-Cilag Pharmaceuticals (India)
- ☐ Janssen-Cilag Pharmaceutical S.A.C.I. (Greece)
- ☐ Janssen-Cilag Polska, Sp. z o.o. (Poland)
- ☐ Janssen-Cilag Pty. Ltd. (Australia)
- ☐ Janssen-Cilag Pty. Ltd. (New Zealand)
- ☐ Janssen-Cilag, S.A. (Spain)
- ☐ Janssen-Cilag S.A.S. (France)
- ☐ Janssen-Cilag S.p.A. (Italy)
- ☐ Janssen-Cilag s.r.o. (Czech Republic)
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- ☐ OMJ Pharmaceuticals, Inc.
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- ☐ Ortho Biologics LLC
- ☐ Ortho Biotech Inc.
- ☐ Ortho Biotech Products, L.P.
- ☐ OrthoNeutrogena division of Ortho-McNeil Pharmaceutical, Inc.

Pharmaceutical (Continued)
- ☐ Ortho Pharmaceutical, Inc.
- ☐ Ortho-McNeil Pharmaceutical, Inc.
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- ☐ PSGA Division of Ortho-McNeil Pharmaceutical, Inc.
- ☐ Scios Inc.
- ☐ Tasmanian Alkaloids Pty. Ltd.
- ☐ Tibotech, Inc.
- ☐ Tibotec Therapeutics Division of Ortho Biotech Products, L.P.
- ☐ Tibotec-Virco Comm. VA (Belgium)
- ☐ Xian-Janssen Pharmaceutical Ltd. (China)

J&J Corporate (Tier 1)
- ☐ Advertising
- ☐ Corporate Communications
- ☐ Corporate Secretary
- ☐ EEO
- ☐ Executive Committee
- ☐ General Law & Law Library
- ☐ GOC – Consumer & Personal Care
- ☐ GOC – MD&D
- ☐ GOC – Medicines & Nutritionals
- ☐ GOC – Consumer Pharmaceuticals & Nutritionals
- ☐ Government Affairs
- ☐ HR Leadership Team
- ☐ Human Resources HQ
- ☐ Human Resources VP
- ☐ Internal Audit
- ☐ Investor Relations
- ☐ J&J Development Corporation
- ☐ J&J Process Excellence
- ☐ Office of CEO
- ☐ Office of CFO
- ☐ Office of CIO
- ☐ Office of Privacy
- ☐ Patent Law
- ☐ Quality Compliance Services
- ☐ Sterilization Science & Tech
- ☐ Technical Resources
- ☐ Treasurer
- ☐ Trademark Law
- ☐ Worldwide Compensation Resources

J&J Corporate (Tier 2)
- ☐ Administration Financial Services
- ☐ Aviation
- ☐ Corporate Information Management (CIM)
- ☐ Accounts Payable
- ☐ Administrative Services Mngmt.
- ☐ Benefits
- ☐ Corporate Affairs
- ☐ Corporate College Recruiting
- ☐ Corporate Contributions
- ☐ Corporate Controller
- ☐ Corporate Office of Science and Technology (COSAT)
- ☐ Diversity
- ☐ Expense Reporting
- ☐ Facilities
- ☐ Facilities Planning Admin
- ☐ Financial M&A Analysis
- ☐ Group Finance
- ☐ Health & Wellness
- ☐ Health Care Compliance
- ☐ HQ Security
- ☐ HQ Services
- ☐ Industrial Relations
- ☐ Info Lifecycle Management
- ☐ Int'l Recruitment & Personnel Development
- ☐ J&J Business Services, Puerto Rico
  (Records Mngr. - Wanda Maldonado)
- ☐ J&J Finance Corporation
- ☐ Medical
- ☐ Network & Computing Services, a Division of Johnson & Johnson Services, Inc. (NCS)
  (Records Mngr. – Nancy Ur)
- ☐ Payroll
- ☐ Pension
- ☐ Placement
- ☐ Purchasing
- ☐ Recruiting Shared Services
- ☐ Risk Management
- ☐ Savings Plan
- ☐ Strategic Sourcing
- ☐ Talent Management VP
- ☐ Tax
- ☐ Treasury
- ☐ Workplace Effectiveness & Employee Advocacy
- ☐ Worldwide Security
- ☐ Worldwide Engineering & Real Estate
- ☐ Worldwide Environmental Affairs
- ☐ Worldwide Energy Management
- ☐ Worldwide Health & Safety
- ☐ Worldwide Operations

J&J LAW DEPARTMENT DOCUMENT PRESERVATION NOTICE DO NOT DESTROY SPECIFIED DOCUMENTS

[Note: For a comprehensive list of hold notices that pertain to your company (U.S. only) or J&J headquarters department, please visit the following website: http://ncsusrajjcnet1p/documenthold/webpages/queryselect.aspx and select the appropriate operating company or corporate department.]

July 26, 2005

RE: Hold Notice for Marie Hartey and Earle Harris v. Ethicon, Inc.

Ethicon,Inc. is party to a lawsuit involving *Mersilene Mesh, Product Code RMI, Lot #LDP085*

In connection with this matter, it is vital to preserve all documents relating in any way to the below listed subject matters until contrary written notice is received from the J&J Law Department. **Failure to preserve these materials could result in Court imposed penalties or sanctions on both the company and/or individual employees.**

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Please save and preserve all documents in categories described below, including e-mails and attachments, drafts, letters, memos, notes (handwritten or typed), reports and tables (either printed or on the computer), slides or other graphics, data stored on computer, audio or video tapes, "working" or other personal files, notes, guidelines and procedures and minutes. Documents must be maintained even if known to be duplicates

of documents held by other persons or you, and even if the duplicate has notes or handwritten comments on it.

"Document" includes all written materials, including all drafts as well as finalized documents, all e-mails and other electronic media (computer files), and all other types of recorded information such as audiotapes, video tapes, etc.

Instructions for Handling Electronic Materials

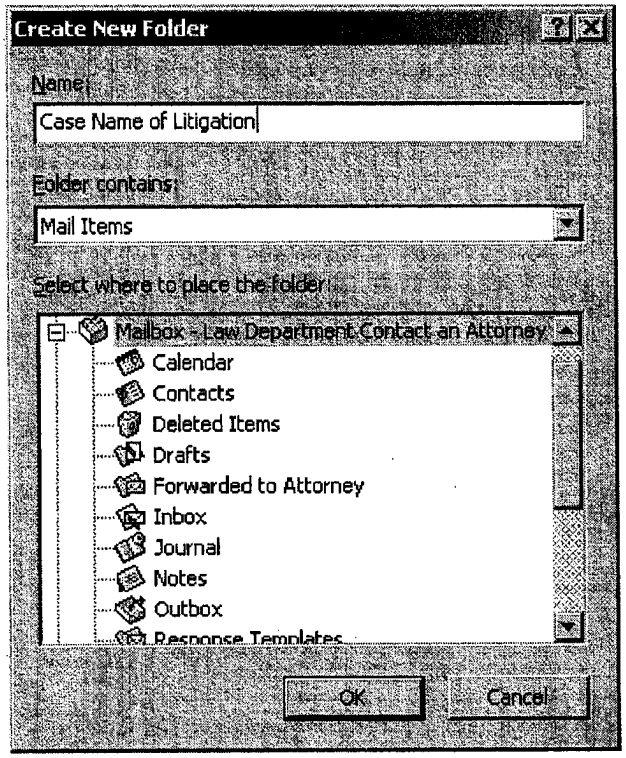
In the event you have e-mails and attachments that fall within the identified categories, you must create a new e-mail folder per product to which you should copy all such sent or received e-mails and attachments so as to prevent their inadvertent deletion. The new folder must be titled "[Mersilene Mesh] Litigation." Instructions on how to create this folder for Microsoft Outlook 2000 and Microsoft Exchange users are attached. This request means all e-mails and attachments that fit the identified description (whether currently in other folders or not now in folders) should be copied into the [Mersilene Mesh] Litigation folder. Specifically this includes copying e-mails from the "in-box," "sent items," "drafts," and "deleted items" location in Outlook or Exchange, and documents maintained on hard drives as well as on the LAN. For all new emails, you should copy the e-mails and attachments to the new e-mail folder within three working days of the e-mails being opened or created by you. For existing emails, you should copy individual emails or entire folders of emails, if relevant, into the new folder.

Creating a Personal Folder for Microsoft Outlook/Exchange

1. Click the word **"Mailbox – [your user name]"** to switch to your "Mailbox – [your user name]" (If you're not already there.)

2. Chose **File->Folder->New Folder** (or press Ctrl+Shift+E) to open the Create New Folder dialog box.

3. Confirm that the word **"Mailbox – [your user name]"** is highlighted in the list of folders at the bottom of the Create New Folder dialog box.



4. In the **Name** text box enter ["Product" Litigation] as the name for your new folder.

5. Click OK to close the Create New Folder dialog box.

6. Visually confirm that the ["Product" Litigation] folder appears.

7. Copy e-mails and attachments into the ["Product" Litigation] folder per hold instructions.

8. Please hold these materials until further notice.

If you have any questions about what documents should be preserved as a result of this notice, please contact me at (732) 524-2472. If you cannot locate me, please contact Taysen Van Itallie at (732) 524-2075.

Lisbeth A. Warren

Subject matters of documents to be preserved:

Hold all documents, memoranda, notes, files, e-mails, etc. relating to: *Mersilene Mesh, Product Code RMI, Lot #LDP085.*

1. **Labeling:** All documents pertaining to *Mersilene Mesh, Product Code RMI, Lot #LDP085* labeling or labeling revisions, including draft and final professional package inserts, patient information, minutes and notes of labeling meetings and all communications regarding same.

2. **Pharmacovigilence**: Adverse Event Reports, line listings or other data, analysis, compilations or discussions of adverse events.

3. **Regulatory**: All final draft communications with regulatory authorities regarding the *Mersilene Mesh, Product Code RMI, Lot #LDP085* including FDA correspondence and inspection records, 483's, IND, NDA, BLA, PMA and 510K, and other regulatory files and audit files including product monographs files (as applicable).

4. **Discovery, Research and Development**: All proposed, completed or ongoing studies, investigations, assessments or clinical evaluations, design, development and testing, fact books, product history, budget analysis, presentations and related communications pertaining to the *Mersilene Mesh, Product Code RMI, Lot #LDP085.*

5. **Product Communications**: All documents pertaining to dear doctor letters, communications with health care professionals or patients including written responses to product inquiries and attachments, telephone logs or other records or communication files dealing with this incident, plaintiff or event including documents pertaining to: records of plaintiff's complaint and incident, if known, and the product actually involved, if returned or available. Also included should be bibliographies, abstracts, reprints, literature search requests, search results, product complaints, investigations, correspondence and testing of the product at issue.

6. **Marketing and Sales Material**: All documents developed for marketing of *Mersilene Mesh, Product Code RMI, Lot #LDP085,* including all print and broadcast marketing materials, contracts and communications with advertising agencies, training and detailing materials, all present and past labeling including package inserts and patient guides held by sales representatives but not for distribution, brochures, graphics, other trade pieces, call logs, notes, diaries or other records pertaining to communications with health care professionals, budgeting, and sales data, including that provided by third party communications regarding same.

7. **Manufacturing Documents**: If product lot batch is known, all *Mersilene Mesh, Product Code RMI, Lot #LDP085* lot and batch records, quality assurance and manufacturing controls and product complaints.

8. **Distribution:** Retail contracts pertaining to the distribution and wholesale of the product at issue including correspondence, sales information, invoices, bills of lading, distribution tracking or analysis and sales history.

J&J LAW DEPARTMENT DOCUMENT PRESERVATION NOTICE DO NOT DESTROY SPECIFIED DOCUMENTS

Date: May 16, 2001

RE: Hold Notice No. 1 for Sponner, Keli v. Gynecare

Gynecare is party to a lawsuit involving allegations of personal injuries due to use of Tension Free Vaginal Tape.

In connection with this matter, it is vital to preserve all documents relating in any way to the below listed subject matters until contrary written notice is received from the J&J Law Department. Failure to preserve these materials could result in harsh penalties or sanctions. "Document" includes all written materials, including all drafts as well as finalized documents, all e-mails and other electronic media (computer files) and all other types of recorded information such as audio tapes, video tapes, etc. Electronic files such as e-mails and those materials that may reside on the LAN must be preserved in personal folders or printed out and preserved in hard copy to avoid automatic deletion. This notice also pertains to all files (on the subjects specified below) you maintain in your office as well as those maintained in shared locations such as general and departmental files.

If you have any questions about what documents should be preserved as a result of this notice, please contact me at (732) 524-2472 . If you cannot locate me, please contact Taysen Van Itallie at (732) 524-2075.

Lisbeth A. Warren

Subject matters of documents to be preserved:

Hold all documents, memoranda, notes, files, e-mails, etc. relating to: Tension Free Vaginal Tape

1. Product Development files, including documents pertaining to:
   Design, development, testing, clinical evaluation, fact books, product history.
2. Regulatory files, including documents pertaining to:
   NDA, IND, IDE, 510k, PMA (as applicable)
   FDA correspondence
   FDA inspection records, 483s
   MDRs, 3500As (as applicable)
   Product monograph files (as applicable)
   Recall files (as applicable)
3. Audit files (as applicable)
4. Marketing, Sales, Consumer Affairs files, including documents pertaining to:
   Labeling
   Advertising
   Dear Doctor letters (Health Care Professional/Distributor/Pharmacy communications)
   Product Complaints/Inquiries
5. Files dealing with this incident, plaintiff, or event, including documents pertaining to:
   All records of this plaintiff's complaint and incident, if known
   The product actually involved, if returned or available
   Manufacturing lot records for this product, if known
   Retained samples, if lot is known
   Product complaint, investigation, correspondence, testing for this product, plaintiff, or incident
   Sales history and records for the hospital, health care facility, doctor, health care provider involved (if known)
   Professional distributor, retailer and/or consumer involved (as applicable), if known

Johnson & Johnson

REVISED

December 17, 2003

RE: Attached Document Preservation Notice
For Floyd Neely v. Ethicon, Inc., et als.
Product Liability Matter

TO: Rita McIntyre, Risk Manager

As described in the attached hold notice, Ethicon, Inc., is a party to a lawsuit arising out of the alleged use of Prolene Mesh, Product Code: PMII, Batch Record #: PBE804.

It is imperative that the specified documents be preserved pending further written notice from the Law Department. Please disseminate the full text of the attached notice company-wide by e-mail and, in addition, distribute the notice in hard copy to all of those you believe have or might have the documents at issue.

Please return to me within five (5) days a copy of the distribution instructions provided for the e-mail and/or hard copy distribution of the document hold memo.

Thank you for your assistance

Karen L. McAndrews

Attachment

cc Steve Rosenberg
Taysen Van Itallie (w/enclosures)
Alison Zoubek
Larry Russo

J&J LAW DEPARTMENT
DOCUMENT PRESERVATION NOTICE
DO NOT DESTROY
SPECIFIED DOCUMENTS

December 17, 2003

RE: Hold Notice for Floyd Neely v. Ethicon, Inc., et als.

Ethicon, Inc. is party to a lawsuit involving Prolene Mesh, Product Code: PMII, Batch Record #: PBE804

In connection with this matter, it is vital to preserve all documents relating in any way to the below listed subject matters until contrary written notice is received from the J&J Law Department. **Failure to preserve these materials could result in Court imposed penalties or sanctions on both the company and/or individual employees.**

Do not discard, destroy or alter in any way any of the documents (electronic or paper) described below. Please ensure that these instructions are followed.

Please save and preserve all documents in the categories described below, including e-mails and attachments, drafts, letters, memos, notes (handwritten or typed), reports and tables (either printed or on the computer), slides or other graphics, data stored on computer, audio or video tapes, "working" or other personal files, notes, guidelines and procedures and minutes. Documents must be maintained even if they are duplicates of documents held by other persons or you, and even if the duplicate has notes or handwritten comments on it.

"Document" includes all written materials, including all drafts as well as finalized documents, all e-mails and other electronic media (computer files), and all other types

Electronic files such as e-mails and those materials that may reside on the LAN must be preserved in personal folders or printed out and preserved in hard copy to avoid automatic deletion. This notice also pertains to all files (on the subjects specified below) that you maintain in your office, as well as those maintained in shared locations such as general and departmental files.

If you have any questions about what documents should be preserved as a result of this notice, please contact me at (732) 524-2472. If you cannot locate me, please contact Taysen Van Itallie at (732) 524-2075.

Lisbeth A. Warren

Subject matters of documents to be preserved:

Hold all documents, memoranda, notes, files, e-mails, etc. relating to Prolene Mesh, Product Code: PMII, Batch Record #: PBE804:

1. **Labeling:** All documents pertaining to Prolene Mesh, Product Code: PMII, Batch Record #: PBE804 labeling or labeling revisions, including draft and final professional package inserts, patient information, minutes and notes of labeling meetings and all communications regarding same.

2. **Pharmacovigilence**: Adverse Event Reports, line listings or other data, analysis, compilations or discussions of adverse events.

3. **Regulatory**: All final draft communications with regulatory authorities regarding the Prolene Mesh, Product Code: PMII, Batch Record #: PBE804 including FDA correspondence and inspection records, 483's, IND, NDA, BLA, PMA and 510K, and other regulatory files and audit files including product monographs files (as applicable).

4. **Discovery, Research and Development**: All proposed, completed or ongoing studies, investigations, assessments or clinical evaluations, design, development and testing, fact books, product history, budget analysis, presentations and related communications pertaining to the Prolene Mesh, Product Code: PMII, Batch Record #: PBE804.

5. **Product Communications**: All documents pertaining to dear doctor letters, communications with health care professionals, or patients including written responses to product inquiries and attachments, telephone logs or other records or communication files dealing with this incident, plaintiff or event including documents pertaining to: records of plaintiff's complaint and incident if known and the product actually involved if returned or available. Also included should be bibliographies, abstracts, reprints, literature search requests, search results, product complaints, investigations, correspondence and testing of the product at issue.

6. **Marketing and Sales Material**: All documents developed for marketing of Prolene Mesh, Product Code: PMII, Batch Record #: PBE804, including all print and broadcast marketing materials, contracts and communications with advertising agencies, training and detailing materials, all present and past labeling including package inserts and patient guides held by sales representatives but not for distribution, brochures, graphics, other trade pieces, call logs, notes diaries or other records pertaining to communications with health care professionals, budgeting, sales data, including that provided by third party communications regarding same.

7. **Manufacturing Documents**: If product lot batch is known, all Prolene Mesh, Product Code: PMII, Batch Record #: PBE804 lot and batch records, quality assurance and manufacturing controls and product complaints.

8. **Distribution**: Retail contracts pertaining to the distribution and wholesale of the product at issue including correspondence, distribution tracking or analysis and sales history.

Johnson & Johnson

December 10, 2003

RE: Attached Document Preservation Notice
For Floyd Neely v. Ethicon, Inc., et als.
Product Liability Matter

TO: Rita McIntyre, Risk Manager

As described in the attached hold notice, Ethicon, Inc., is a party to a lawsuit arising out of the alleged use of Prolene Mesh.

It is imperative that the specified documents be preserved pending further written notice from the Law Department. Please disseminate the full text of the attached notice company-wide by e-mail and, in addition, distribute the notice in hard copy to all of those you believe have or might have the documents at issue.

Please return to me within five (5) days a copy of the distribution instructions provided for the e-mail and/or hard copy distribution of the document hold memo.

Thank you for your assistance

Karen L. McAndrews

Attachment

cc Steve Rosenberg
Taysen Van Itallie (w/enclosures)
Alison Zoubek
Larry Russo

J&J LAW DEPARTMENT
DOCUMENT PRESERVATION NOTICE
DO NOT DESTROY
SPECIFIED DOCUMENTS

December 10, 2003

RE: Hold Notice for Floyd Neely v. Ethicon, Inc., et als.

Ethicon, Inc. is party to a lawsuit involving Prolene Mesh

In connection with this matter, it is vital to preserve all documents relating in any way to the below listed subject matters until contrary written notice is received from the J&J Law Department. **Failure to preserve these materials could result in Court imposed penalties or sanctions on both the company and/or individual employees.**

Do not discard, destroy or alter in any way any of the documents (electronic or paper) described below. Please ensure that these instructions are followed.

Please save and preserve all documents in the categories described below, including e-mails and attachments, drafts, letters, memos, notes (handwritten or typed), reports and tables (either printed or on the computer), slides or other graphics, data stored on computer, audio or video tapes, "working" or other personal files, notes, guidelines and procedures and minutes. Documents must be maintained even if they are duplicates of documents held by other persons or you, and even if the duplicate has notes or handwritten comments on it.

"Document" includes all written materials, including all drafts as well as finalized documents, all e-mails and other electronic media (computer files), and all other types of recorded information such as audio tapes, video tapes, etc.

Electronic files such as e-mails and those materials that may reside on the LAN must be preserved in personal folders or printed out and preserved in hard copy to avoid automatic deletion. This notice also pertains to all files (on the subjects specified below) that you maintain in your office, as well as those maintained in shared locations such as general and departmental files.

If you have any questions about what documents should be preserved as a result of this notice, please contact me at (732) 524-2472. If you cannot locate me, please contact Taysen Van Itallie at (732) 524-2075.

Lisbeth A. Warren

Subject matters of documents to be preserved:

Hold all documents, memoranda, notes, files, e-mails, etc. relating to Prolene Mesh:

1. **Labeling:** All documents pertaining to Prolene Mesh labeling or labeling revisions, including draft and final professional package inserts, patient information, minutes and notes of labeling meetings and all communications regarding same.

2. **Pharmacovigilence**: Adverse Event Reports, line listings or other data, analysis, compilations or discussions of adverse events.

3. **Regulatory**: All final draft communications with regulatory authorities regarding the Prolene Mesh including FDA correspondence and inspection records, 483's, IND, NDA, BLA, PMA and 510K, and other regulatory files and audit files including product monographs files (as applicable).

4. **Discovery, Research and Development**: All proposed, completed or ongoing studies, investigations, assessments or clinical evaluations, design, development and testing, fact books, product history, budget analysis, presentations and related communications pertaining to the Prolene Mesh.

5. **Product Communications**: All documents pertaining to dear doctor letters, communications with health care professionals, or patients including written responses to product inquiries and attachments, telephone logs or other records or communication files dealing with this incident, plaintiff or event including documents pertaining to: records of plaintiff's complaint and incident if known and the product actually involved if returned or available. Also included should be bibliographies, abstracts, reprints, literature search requests, search results, product complaints, investigations, correspondence and testing of the product at issue.

6. **Marketing and Sales Material**: All documents developed for marketing of Prolene Mesh, including all print and broadcast marketing materials, contracts and communications with advertising agencies, training and detailing materials, all present and past labeling including package inserts and patient guides held by sales representatives but not for distribution, brochures, graphics, other trade pieces, call logs, notes diaries or other records pertaining to communications with health care professionals, budgeting, sales data, including that provided by third party communications regarding same.

7. **Manufacturing Documents**: If product lot batch is known, all Prolene Mesh lot and batch records, quality assurance and manufacturing controls and product complaints.

8. **Distribution**: Retail contracts pertaining to the distribution and wholesale of the product at issue including correspondence, distribution tracking or analysis and sales history.